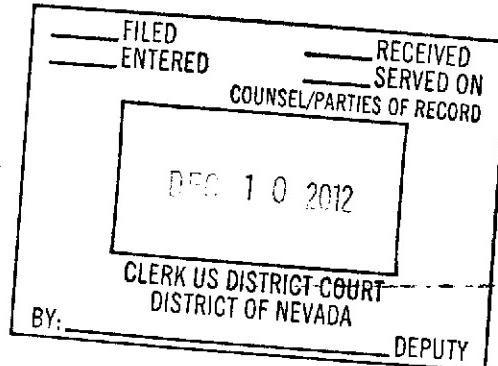


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***SEALED***

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6 **UNITED STATES DISTRICT COURT**  
 7 **DISTRICT OF NEVADA**

8 -oo-

9 UNITED STATES OF AMERICA

10 PLAINTIFF

11 VS.

12 [1] ROMAN ZOLOTAREV,  
 A.K.A. ADMIN,  
 A.K.A. SUPPORT,  
 13 (Counts 1-2, 19)

14 [2] KONSTANTIN LOPATIN,  
 A.K.A. GRAF,  
 15 (Counts 1-2, 33, 44, 47)

16 [3] ALEXANDER KOSTYUKOV,  
 A.K.A. TEMP,  
 17 A.K.A. KLBS, (Counts 1-2, 3-17)

18 [4] MACEO BOOZER III ,  
 A.K.A. XXXSIMONE ,  
 19 A.K.A. G4 ,  
 A.K.A. EL PADRINO ,  
 20 A.K.A. MR. RIGHT,  
 A.K.A. MRDC87,  
 21 (Counts 1-2, 3-17)

22 [5] TIN-YUEN WONG ,  
 A.K.A. RAY WONG,  
 23 A.K.A. RAY,  
 (Counts 1-2, 3-17)

24 [6] EDWARD MONTECALVO ,  
 A.K.A N1GHTMARE,  
 25 A.K.A. TENURE44,  
 (Counts 1-2, 3-17, 22-55)

) CRIMINAL INDICTMENT

) 2:12-CR- 604

) **VIOLATIONS:**

) 18 U.S.C. § 1962(c) and 1963: Participation  
 in a Racketeer Influenced Corrupt  
 Organization (Count 1);

) 18 U.S.C. § 1962(d): Conspiracy to  
 Engage in a Racketeer Influenced  
 Corrupt Organization (Count 2);

) 18 U.S.C. § 1028(a)(1): Unlawful  
 Trafficking in and Production of Counterfeit  
 Identification Documents or Authentication  
 Features (Counts 3 -17);

) 18 U.S.C. § 1028(a)(1): Attempt to Unlawful  
 Trafficking in and Production of Counterfeit  
 Identification Documents or Authentication  
 Features (Count -18);

) 18 U.S.C. § 1028(a)(2): Conspiracy to  
 Unlawfully Transfer Identification  
 Document, Authentication Feature, and False  
 Identification Document (Count 19);

) 18 U.S.C. § 1028(a)(7) and (c)(3)(A):  
 Unlawful Transfer, Possession, and Use of a  
 Means of Identification (Count 20);

) 18 U.S.C. § 1029(a)(2): Trafficking in and  
 Use of Counterfeit and Unauthorized Access  
 Devices (Count 21);

1	[7] YU FENG WANG , A.K.A IBATISTUTA, (Counts 1-2)	)	18 U.S.C. § 1029(a)(3): Possession of Fifteen or More Counterfeit and Unauthorized Access Devices (Counts 22 -55);
3	[8] MOHAMED AMR MAHMOUD, A.K.A. AMR MAHMOUD, A.K.A. CC -- TRADER, A.K.A. KENGZA, (Counts 1-2, 20, 22-55)	)	18 U.S.C. § 1029(a)(4): Unlawful Possession, Production and Trafficking in Device-Making Equipment (Counts 56-60);
6	[9] JERMAINE SMITH , A.K.A. SIRCHARLIE57, A.K.A. FAIRBUSINESSMAN, (Counts 1-2, 61- 62)	)	18 U.S.C. § 1029(a)(4): Conspiracy to Unlawful Possession, Production and Trafficking in Device-Making Equipment (Counts 61-62); and
8	[10] MAKYL HAGGERTY, A.K.A. WAVE, (Counts 1-2)	)	18 U.S.C. § 2: Aiding and Abetting (Counts 1, 3-17, 18, 20, 21, 22-56, 61-62).
10	[11] ALADELOLA TESLIM AJAYI , A.K.A. BANK MANAGER, A.K.A. DOCUMENT MANAGER, A.K.A. COREY, (Counts 1-2, 61-62)	)	
13	[12] ALEXANDRU ION, A.K.A. ABAGNALEFRANK, (Counts 1-2)	)	
14	[13] JORDAN GEORGIEVSKI, A.K.A.DEVICA, (Counts 1-2)	)	
16	[14] ROMAN SELEZNEV, A.K.A. TRACK2, A.K.A. BULBA, A.K.A. NCUX, (Counts 1-2, 22-55)	)	
19	[15] QASIR MUKHTAR, A.K.A. CALIBER, (Counts 1-2, 56-60)	)	
21	[16] ROY AYAD, A.K.A. RABIE AYAD A.K.A. PATISTOTA, (Counts 1-2, 22-55)	)	
23	[17] MINA MORRIS, A.K.A. SOURCE, (Counts 1-2, 22-55)	)	
25	[18] RACHID IDAALI, A.K.A. C4RD3R, (Counts 1-2, 22-55)	)	

1 [19] LIRIDON MUSLIU,  
A.K.A. BOWL,  
2 (Counts 1-2, 22-55)  
3 [20] SERGEI LITVINENKO,  
A.K.A. DORBIK,  
4 A.K.A. MATAD0R,  
(Count 2)  
5 [21] MICHAEL LOFTON,  
A.K.A. KILLIT,  
6 A.K.A. LOFEAZY,  
7 (Counts 1-2, 3-17)  
8 [22] SHIYANG GOU,  
A.K.A. CDER,  
9 (Counts 1-2, 3-17)  
10 [23] DAVID RAY CAMEZ,  
A.K.A. BADMAN,  
11 A.K.A. DOCTORSEX,  
(Counts 1-2, 3-17)  
12 [24] CAMERON HARRISON,  
A.K.A. KILOBIT,  
13 (Counts 1-2, 3-17)  
14 [25] ALEKSANDAR BESAROVIC,  
A.K.A. QILLER,  
15 (Counts 1-2, 3-17)  
16 [26] DUVAUGHN BUTLER,  
A.K.A. MACKMANN,  
17 (Counts 1-2, 21, 61-62)  
18 [27] FREDRICK THOMAS,  
A.K.A 1STUNNA,  
19 (Counts 1-2)  
20 [28] JOHN DOE 1,  
A.K.A SENNA071,  
21 (Counts 1-2, 3-17)  
22 [29] JOHN DOE 2,  
A.K.A. MORFIY,  
23 (Counts 1-2, 3-17)  
24 [30] JOHN DOE 3,  
A.K.A. GRUBER,  
25 (Counts 1-2, 18)  
26 )

1 [31] JOHN DOE 4,  
A.K.A. MAXXTRO,  
(Counts 1-2) )  
2 )  
3 [32] JOHN DOE 5,  
A.K.A. ELIT3,  
(Counts 1-2) )  
4 )  
5 [33] JOHN DOE 6,  
A.K.A. FOZZY,  
(Counts 1-2, 22-55) )  
6 )  
7 [34] JOHN DOE 7,  
A.K.A. VITRUM,  
A.K.A. LERMENTOV,  
(Counts 1-2, 22-55) )  
8 )  
9 [35] ANDREI BOLOVAN,  
A.K.A. PANTHER,  
A.K.A. EUPHORIC,  
A.K.A. DARKMTH,  
(Counts 1-2, 22-55) )  
10 )  
11 )  
12 [36] JOHN DOE 8,  
A.K.A. TM,  
(Counts 1-2, 22-55) )  
13 )  
14 [37] JOHN DOE 9,  
A.K.A. ZOOMER,  
A.K.A. DEPUTAT,  
(Counts 1-2, 22-55) )  
15 )  
16 )  
17 [38] JOHN DOE 10,  
A.K.A. CENTURION,  
(Counts 1-2, 22-55) )  
18 )  
19 [39] JOHN DOE 11,  
A.K.A. CONSIGLIORI,  
(Counts 1-2, 61-62) )  
20 )  
21 DEFENDANTS.)  
22 . . .  
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24 . . .  
25 . . .  
26 . . .

1 THE GRAND JURY CHARGES THAT:

2 GENERAL ALLEGATIONS

3 The following General Allegations are realleged and incorporated *in toto* by reference in  
4 Count One (Participate in a Racketeer Influenced Corrupt Organization) and Count Two (Conspiracy  
5 to Engage in a Racketeer Influenced Corrupt Organization) herein.

6 THE ENTERPRISE

7 1. At all times relevant to this indictment,

- [1] ROMAN ZOLOTAREV a.k.a. Admin a.k.a. Support;
- [2] KONSTANTIN LOPATIN a.k.a. Graf;
- [3] ALEXANDER KOSTYUKOV a.k.a. Temp a.k.a. Klbs;
- [4] MACEO BOOZER III a.k.a. XXXSimone a.k.a. G4 a.k.a. El Padrino a.k.a. Mr. Right a.k.a. mrdc87;
- [5] TIN-YUEN WONG a.k.a. Ray Wong a.k.a. Ray;
- [6] EDWARD MONTECALVO a.k.a. N1ghtmare a.k.a. Tenure44;
- [7] YU FENG WANG a.k.a. Ibatistuta;
- [8] MOHAMED AMR MAHMOUD a.k.a. AMR MAHMOUD a.k.a. CC -- Trader a.k.a. Kengza;
- [9] JERMAINE SMITH a.k.a. Sircharlie57 a.k.a. Fairbusinessman;
- [10] MAKYL HAGGERTY a.k.a. Wave;
- [11] ALADELOLA TESLIM AJAYI a.k.a. Bank Manager a.k.a. Document Manager a.k.a. Corey;
- [12] ALEXANDRU ION a.k.a. Abagnalefrank;
- [13] JORDAN GEORGIEVSKI a.k.a. Devica;
- [14] ROMAN SELEZNEV a.k.a. Track2 a.k.a. Bulba a.k.a. Ncux;
- [15] QASIR MUKHTAR a.k.a. Caliber;
- [16] ROY AYAD a.k.a. RABIE AYAD a.k.a. Patistota;
- [17] MINA MORRIS a.k.a. Source;
- [18] RACHID IDAALI a.k.a. C4rd3R;
- [19] LIRIDON MUSLIU a.k.a. Bowl;
- [20] SERGEI LITVINENKO a.k.a. Dorbik a.k.a. Matad0r;
- [21] MICHAEL LOFTON a.k.a. Killit a.k.a. Lofeazy;
- [22] SHIYANG GOU a.k.a. Cder;
- [23] DAVID RAY CAMEZ a.k.a. Bad Man a.k.a. Doctorsex;
- [24] CAMERON HARRISON a.k.a. Kilobit;
- [25] ALEKSANDAR BESAROVIC a.k.a. Qiller;
- [26] DUVAUGHN BUTLER a.k.a. Mackmann;
- [27] FREDRICK THOMAS a.k.a. 1Stunna;
- [28] JOHN DOE 1 a.k.a. Senna071;
- [29] JOHN DOE 2 a.k.a. Morfiy;
- [30] JOHN DOE 3 a.k.a. Gruber;
- [31] JOHN DOE 4 a.k.a. Maxxtro;
- [32] JOHN DOE 5 a.k.a. Elit3;
- [33] JOHN DOE 6 a.k.a. Fozzy;
- [34] JOHN DOE 7 a.k.a. Vitrum a.k.a. Lermentov;

- 1 [35] ANDREI BOLOVAN a.k.a. Panther a.k.a. Euphoric a.k.a. Darkmth;  
 2 [36] JOHN DOE 8 a.k.a. TM;  
 3 [37] JOHN DOE 9 a.k.a. Zo0mer a.k.a. Deputat;  
 4 [38] JOHN DOE 10 a.k.a. Centurion; and  
 5 [39] JOHN DOE 11 a.k.a. Consiglieri;

6 the defendants herein, and others known and unknown, are members of, employed by, and associates  
 7 of a criminal organization, hereafter referred to as "the Carder.su organization," whose members  
 8 engage in acts of identity theft and financial fraud, including, but not limited to, acts involving  
 9 trafficking in stolen means of identification; trafficking in, production and use of counterfeit  
 10 identification documents; identity theft; trafficking in, production and use of unauthorized and  
 11 counterfeit access devices; and bank fraud; and whose members interfere with interstate and foreign  
 12 commerce through acts of identity theft and financial fraud. Members and associates of the  
 13 Carder.su organization operate principally in Las Vegas, Nevada, and elsewhere.

14       2. The Carder.su organization, including its leadership, members, and associates,  
 15 constitutes an "enterprise," as defined by Title 18, United States Code, Section 1961(4), that is, a  
 16 group of individuals associated in fact, although not a legal entity. The enterprise constitutes an  
 17 ongoing organization whose members function as a continuing unit for a common purpose of  
 18 achieving the objectives of the enterprise. The enterprise is engaged in, and its activities affect,  
 19 interstate and foreign commerce.

#### PURPOSES OF THE ENTERPRISE

20       3. The purposes of the enterprise include, but are not limited to, the following:

- 21           A. to enrich the members and associates of the enterprise through the unlawful  
 22 trafficking in: means of identification, document-making implements,  
 23 counterfeit identification documents, device-making equipment, and,  
 24 unauthorized and counterfeit access devices;
- 25           B. to create, maintain, and control a marketplace for the distribution of stolen  
 26 property, such as victims' personal and financial means of identification;

- 1 C. to protect the enterprise and its members from detection, apprehension and
- 2 prosecution by law enforcement;
- 3 D. to preserve and protect the operations and profit of the enterprise through the
- 4 use of discipline, expulsion, and other acts of retribution; and
- 5 E. to promote and enhance the reputation and standing of the enterprise and its
- 6 members among rivals.

#### MEANS AND METHODS OF THE ENTERPRISE

7 4. Among the means and methods by which the defendants and their associates conduct  
8 and participate in the conduct of the affairs of the enterprise include, but are not limited to, the  
9 following:

- 10 A. Members of the enterprise and their associates did traffic in and produce, did  
11 attempt to traffic in and produce, and did conspire to traffic in and produce,  
12 counterfeit identification documents, which affects interstate and foreign  
13 commerce.
- 14 B. Members of the enterprise and their associates did unlawfully transfer, did  
15 attempt to unlawfully transfer, and did conspire to unlawfully transfer  
16 counterfeit identification documents, which affects interstate and foreign  
17 commerce.
- 18 C. Members of the enterprise and their associates did possess document-making  
19 implements, did attempt to possess document-making implements, and did  
20 conspire to possess document-making implements, which affects interstate  
21 and foreign commerce.
- 22 D. Members of the enterprise and their associates did unlawfully transfer,  
23 possess and use, did attempt to unlawfully transfer, possess and use, and did  
24 conspire to unlawfully transfer, possess and use a means of identification of

1 another person in the commission of and in connection with the crime of  
2 Bank Fraud, which affects interstate and foreign commerce.

3 E. Members of the enterprise and their associates did traffic in and use, did  
4 attempt to traffic in and use, and did conspire to traffic in and use counterfeit  
5 and unauthorized access devices, which affects interstate and foreign  
6 commerce.

7 F. Members of the enterprise and their associates did possess, did attempt to  
8 possess, and did conspire to possess fifteen (15) or more counterfeit and  
9 unauthorized access devices, which affects interstate and foreign commerce.

10 G. Members of the enterprise and their associates did traffic in and possess, did  
11 attempt to traffic in and possess, and did conspire to traffic in and possess  
12 device-making equipment, which affects interstate and foreign commerce.

13 H. Members of the enterprise and their associates did plan, attempt to plan, and  
14 conspire to plan, with the intent to defraud, schemes to unlawfully obtain  
15 money and property from banks and other financial institutions by way of  
16 fraud, and material misrepresentations and false promises.

17 I. Members of the enterprise and their associates did use various means of  
18 communication designed to protect the membership's anonymity and to  
19 provide security for the criminal organization from attack by other rival  
20 criminal organizations and from law enforcement detection, including but  
21 not limited to, the use of:

22 (i) Various website forums and chat rooms, such as Carder.info,  
23 Carder.su, Crdsu.su, Carder.biz, and Carder.pro, which are  
24 controlled by the Carder.su organization for use as their online  
25 gathering places, that is, as "virtual clubhouses," which

1 provide secure meeting locations for the members and  
2 associates of the criminal organization;

- 3 (ii) Private messaging ("PM") which is a non-forum wide message  
4 sent between individual members on the criminal organization's  
5 website forums;
- 6 (iii) E-mail, some of which are encrypted and password protected,  
7 or use service providers located outside the United States;
- 8 (iv) ICQ chat, which is a free instant messaging electronic  
9 communication services provided by ICQ, Inc., a  
10 subsidiary of AOL. ICQ user accounts are identified by a  
11 Universal Identification Number ("UIN");
- 12 (v) Proxies, which are achieved by bouncing from one computer  
13 to another to hide a member's true originating IP address;
- 14 (vi) Virtual Private Network, ("VPNs"), which are similar to a  
15 proxy, but with the addition of creating an encrypted tunnel that  
16 cannot be monitored; and
- 17 (vii) protected drop sites in the District of Nevada, and elsewhere,  
18 in the event that there is a need to transport, transfer, and  
19 receive physical items of contraband.

20

21 **ROLES OF THE DEFENDANTS**

22 **Organizational Hierarchy**

23 5. Leaders, members and associates of the Carder.su Organization have defined roles  
24 in the enterprise. At all times relevant to this indictment, the defendants participated in the operation  
25 and the management of the enterprise as follows:

1                   a.         Administrator - Defendant [1] **ROMAN ZOLOTAREV** a.k.a. Admin a.k.a.  
 2 Support, (hereafter “[1] ZOLOTAREV”), is the Administrator of the Carder.su organization.  
 3 [1] ZOLOTAREV serves as the head of the governing council for the criminal organization who,  
 4 collectively, control the destiny of the enterprise. The administrator handles day-to-day management  
 5 decisions of the organization, as well as long-term strategic planning for its continued viability. As  
 6 such, [1] ZOLOTAREV acts as a leader of the enterprise, by appointing moderators, and directing  
 7 other members and associates of the enterprise in carrying out unlawful and other activities in  
 8 furtherance of the conduct of the enterprise’s affairs. [1] ZOLOTAREV determines which  
 9 individuals can become and remain members of the Carder.su organization. [1] ZOLOTAREV  
 10 regulates the functions, responsibilities and levels of access to information accorded to each member.  
 11 [1] ZOLOTAREV bestows the rewards accorded members for their loyalty to the Carder.su  
 12 organization, and sets the punishments to be meted out to members evidencing disloyalty to the  
 13 organization. [1] ZOLOTAREV decides when, how, and under what circumstances to attack and  
 14 to retaliate against members of rival criminal organizations and their associated Internet website  
 15 forums. As the administrator, [1] ZOLOTAREV has full access to, and privileges on, the computer  
 16 servers hosting the Carder.su organization’s websites. [1] ZOLOTAREV has ultimate responsibility  
 17 for the administration, maintenance, anonymity and security of the Carder.su organization’s  
 18 computer servers, as well as for the content of the Carder.su organization’s Internet website forums.  
 19 [1] ZOLOTAREV’s criminal activities in furtherance of the enterprise, include, but are not limited  
 20 to, the commission of conspiracy to unlawfully transfer and sell false identification documents, and  
 21 access device fraud.

22                   b.         Moderators - Defendants [2] **KONSTANTIN LOPATIN** a.k.a. Graf,  
 23 (hereafter “[2] LOPATIN”), and [31] **JOHN DOE 4** a.k.a. Maxxtro (hereafter “[31] MAXXTRO”),  
 24 are Moderators within the Carder.su organization. As such, these defendants act as leaders of the  
 25 enterprise, directing other members and associates in carrying out unlawful and other activities in  
 26 furtherance of the conduct of the enterprise’s affairs. Moderators are members of the Carder.su

1 organization's governing counsel; as such, they oversee and manage one or more subject matter  
 2 specific areas on the Carder.su organization's websites that either fall within an area of the  
 3 Moderators' expertise, or cover their geographic location. As Moderators, [2] **LOPATIN** and [31]  
 4 **MAXXTRO** assist [1] **ZOLOTAREV** in monitoring and policing the Carder.su organization's  
 5 websites by editing and deleting members' posts on these forums and by mediating disputes among  
 6 the members. Moderators also frequently serve as Reviewers for particular products or services  
 7 provided through the enterprise with which they have an expertise. [2] **LOPATIN**'s criminal  
 8 activities in furtherance of the enterprise include, but are not limited to, conspiracy to possess and  
 9 possession of fifteen (15) or more counterfeit and unauthorized access devices. [31] **MAXXTRO**'s  
 10 criminal activities in furtherance of the enterprise include, but are not limited to, transfer and use of  
 11 means of identification, and possession of fifteen (15) or more counterfeit and unauthorized access  
 12 devices.

13                   c.     Reviewers - The Carder.su organization allows members to sell contraband,  
 14 including, but not limited to, counterfeit documents and stolen bank account and credit card  
 15 information by way of the Carder.su organization's websites to further the activities of the enterprise.  
 16 Reviewers examine and test products and services that members of the Carder.su organization wish  
 17 to advertise and sell on its websites. Once Reviewers complete their examination of the products and  
 18 services, they post a written summary of that examination or testing on the Carder.su organization's  
 19 websites. A favorable written review is a prerequisite to selling contraband on the websites. While  
 20 most Reviewers primarily serve in the capacity of Administrator or Moderator for the enterprise, any  
 21 qualified individual, even a general member, can be appointed by the Administrator to conduct a  
 22 review. Any member of the Carder.su organization could be appointed to serve as a Reviewer at any  
 23 time.

24                   d.     Vendors - Vendors advertise and sell products, services, and other contraband  
 25 to members of the Carder.su organization by way of the Carder.su organization's websites after  
 26 receiving a favorable written review from a Reviewer. Once a Reviewer is designated, a prospective

1 Vendor is required to ship multiple samples of the product or provide the reviewer with access to  
 2 the vendor's services to facilitate completion of the review. This contact between the prospective  
 3 Vendor and the Reviewer is usually made through private email messaging or through a public post  
 4 in the appropriate section on the Carder.su organization's websites.

5 (i) Defendant [3] **ALEXANDER KOSTYUKOV** a.k.a. Temp a.k.a.  
 6 Klbs, (hereafter “[3] **KOSTYUKOV**”), is a Vendor of cashout services in the Carder.su  
 7 organization. [3] **KOSTYUKOV**’s cashout services provide members of the Carder.su organization  
 8 with a method to transfer funds, typically used in connection with obtaining and laundering illicitly  
 9 obtained funds from stolen bank and credit card accounts. [3] **KOSTYUKOV** receives a fee,  
 10 generally between forty-five percent (45%) and sixty-two percent (62%) of the total funds  
 11 laundered, in exchange for providing members with cashout services. [3] **KOSTYUKOV**’s criminal  
 12 activities in furtherance of the enterprise include, but are not limited to, the production and  
 13 trafficking in counterfeit identification documents.

14 (ii) Defendant [4] **MACEO BOOZER III** a.k.a. XXXSimone a.k.a. G4  
 15 a.k.a. El Padrino a.k.a. Mr. Right a.k.a. mrdc87, (hereafter “[4] **BOOZER III**”), is a Vendor of  
 16 “dumps,” that is, stolen and otherwise stolen credit card and debit card account data, in the Carder.su  
 17 organization. [4] **BOOZER III** sells dumps to members for prices ranging from fifteen dollars (\$15)  
 18 to one hundred fifty dollars (\$150), depending on the quantity purchased and the geographical  
 19 location from which the dumps originate. Dumps from the United States are sold as the least  
 20 expensive and dumps from the Europe are sold as the most expensive. [4] **BOOZER III**’s criminal  
 21 activities in furtherance of the enterprise include, but are not limited to, the production and  
 22 trafficking in counterfeit identification documents, and possession of fifteen (15) or more counterfeit  
 23 and unauthorized access devices.

24 (iii) Defendant [5] **TIN-YUEN WONG** a.k.a. Ray Wong a.k.a. Ray,  
 25 (hereafter “[5] **WONG**”), is a Vendor of counterfeit plastic, which is a device-making implement  
 26 used to produce counterfeit credit cards, in the Carder.su organization. [5] **WONG** sells blank

1 counterfeit plastic cards to members for twenty dollars (\$20) to twenty five dollars (\$25) each,  
 2 depending on the amount ordered, and he requires a minimum order of fifty (50). [5] **WONG** also  
 3 sells embossed counterfeit credit cards for sixty five dollars (\$65) to seventy five dollars (\$75) each,  
 4 with a minimum order of ten (10). Additionally, [5] **WONG** also advertises on the Carder.su  
 5 organization's websites as a Vendor of dumps, that is, stolen Visa credit card account numbers  
 6 priced from standard cards at thirty dollars (\$30) each, to platinum or business cards at forty five  
 7 dollars (\$45) each. [5] **WONG**'s criminal activities in furtherance of the enterprise include, but are  
 8 not limited to, the production and trafficking in counterfeit identification documents, unlawful  
 9 transfer and use of a means of identification, and conspiracy to possess device making equipment.

10 (iv) Defendant [6] **EDWARD MONTECALVO** a.k.a N1ghtmare a.k.a.  
 11 Tenure44, (hereafter “[6] **MONTECALVO**”), is a Vendor of dumps in the Carder.su organization  
 12 who also provides to members a dumps checking service, which checks with the issuing financial  
 13 institution to make sure, at the time of the member's purchase, that the credit card account being sold  
 14 is still valid and open. [6] **MONTECALVO**'s criminal activities in furtherance of the enterprise  
 15 include, but are not limited to, the production and trafficking in counterfeit identification documents,  
 16 possession of document-making equipment, and possession of fifteen (15) or more counterfeit and  
 17 unauthorized access devices.

18 (v) Defendant [7] **YU FENG WANG** a.k.a Ibatistuta, (hereafter “[7]  
 19 **WANG**”), is a Vendor of dumps in the Carder.su organization, as well as a Vendor of counterfeit  
 20 credit cards, counterfeit holograms, and signature panels that can be used to manufacture counterfeit  
 21 credit cards. [7] **WANG** sells blank plastic cards to members for ten dollars (\$10) to fifteen dollars  
 22 (\$15) each, depending on the quantity ordered. [7] **WANG** sells the counterfeit holograms and  
 23 signatures for one dollar (\$1) each. [7] **WANG**'s criminal activities in furtherance of the enterprise  
 24 include, but are not limited to, possession of fifteen (15) or more counterfeit and unauthorized access  
 25 devices.

( vi) Defendant [8] **MOHAMED AMR MAHMOUD** a.k.a. AMR MAHMOUD a.k.a. CC -- Trader a.k.a. Kengza, (hereafter “[8] MAHMOUD”), is a Vendor in the Carder.su organization of “CVV,” that is, stolen credit card account data which typically contains all of a cardholder’s information, except not the magnetic track information contained on the rear of the physical credit card. CVV information includes an account holder’s name, date of birth, Social Security number, address, telephone number and mother’s maiden name, as well as the security code on the rear of the credit card. [8] MAHMOUD also sells to members, for ten dollars (\$10) each, stolen PayPal accounts, which include username and the password needed to access the PayPal account. [8] MAHMOUD also sells “Fullz,” which include full name, billing address, credit card account number, expiration date, Personal Identification Numbers (“PINs”), Social Security number, mother’s maiden name, date of birth and the security code on the rear of a credit card, for a victim account for twenty dollars (\$20) each, with a minimum order of two hundred dollars (\$200). Also, [8] MAHMOUD sells “Enroll/COBs,” which include full name, billing address, credit card account number, expiration date, PIN, Social Security number, mother’s maiden name, date of birth, the security code on the rear of a credit card, and the username and password to access the account online, for one hundred forty dollars (\$140) to two hundred dollars (\$200) each, depending on the amount of money in the victim account. [8] MAHMOUD’s criminal activities in furtherance of the enterprise include, but are not limited to, transfer and use of means of identification, and possession of fifteen (15) or more counterfeit and unauthorized access devices.

( vii) Defendant [9] JERMAINE SMITH a.k.a. Sircharlie57 a.k.a.  
Fairbusinessman, (hereafter “[9] SMITH”), is a Vendor of counterfeit plastic and counterfeit credit  
cards in the Carder.su organization. [9] SMITH’s criminal activities in furtherance of the enterprise  
include, but are not limited to, possession of fifteen (15) or more counterfeit and unauthorized access  
devices, and conspiracy to possess and possession of device-making equipment.

25 ( viii) Defendant [10] **MAKYL HAGGERTY** a.k.a. Wave, (hereafter “[10]  
26 **HAGGERTY**”), is a Vendor of counterfeit identification documents and counterfeit credit cards in

1 the Carder.su organization. [10] **HAGGERTY** manufactures and sells counterfeit drivers licenses  
2 to members for the states of California, Texas, Wisconsin, Ohio, Rhode Island, Nevada,  
3 Pennsylvania, Illinois, Florida, Louisiana, Arizona, Hawaii, South Carolina, Georgia and New  
4 Jersey, as well as British Columbia, Canada. The prices range from one hundred dollars (\$100) to  
5 two hundred dollars (\$200), depending on the state. [10] **HAGGERTY** also sells blank counterfeit  
6 plastic for twenty dollars (\$20) each and embossed counterfeit credit cards for thirty dollars (\$30)  
7 each. [10] **HAGGERTY** criminal activities in furtherance of the enterprise include, but are not  
8 limited to, conspiracy to produce counterfeit identification documents, possession of fifteen (15) or  
9 more counterfeit and unauthorized access devices, and conspiracy to possess device-making  
10 equipment.

11 ( ix) Defendant [11] ALADELOLA TESLIM AJAYI a.k.a. Bank  
12 Manager a.k.a. Document Manager a.k.a. Corey, (hereafter “[11] AJAYI”), is a Vendor of  
13 counterfeit identification documents, stolen or otherwise stolen corporate account information,  
14 dumps, and counterfeit credit cards in the Carder.su organization. [11] AJAYI’s criminal activities  
15 in furtherance of the enterprise include, but are not limited to, possession of fifteen (15) or more  
16 counterfeit and unauthorized access devices, and conspiracy to possess device-making equipment.

17 (x) Defendant [12] ALEXANDRU ION a.k.a. Abagnalefrank, (hereafter  
18 “[12] ION”) is a Vendor of dumps in the Carder.su organization. [12] ION sells members bulk  
19 quantities of one hundred (100) mixed Visa and MasterCard accounts for one thousand five hundred  
20 dollars (\$1,500) and one hundred (100) American Express cards for one thousand dollars (\$1,000).  
21 [12] ION’s criminal activities in furtherance of the enterprise include, but are not limited to,  
22 unlawful transfer and use of a means of identification, and possession of fifteen (15) or more  
counterfeit and unauthorized access devices.

24 (xi) Defendant [13] **JORDAN GEORGIEVSKI** a.k.a. Devica, (hereafter  
25 “[13] **GEORGIEVSKI**”), is a Vendor in the Carder.su organization of counterfeit credit cards, as  
26 well as counterfeit holograms that can be used to manufacture counterfeit credit cards.

1 [13] **GEORGIEVSKI** sells blank counterfeit plastic cards to members for forty five dollars (\$45)  
 2 each and embossed counterfeit credit cards for seventy five dollars (\$75) each.

3 [13] **GEORGIEVSKI**'s prices for the counterfeit holograms vary by the quantity purchased.

4 [13] **GEORGIEVSKI**'s criminal activities in furtherance of the enterprise include, but are not  
 5 limited to, possession of fifteen (15) or more counterfeit and unauthorized access devices, and  
 6 conspiracy to possess and possession of device making equipment.

7 (xii) Defendant [14] **ROMAN SELEZNEV** a.k.a. Track2 a.k.a. Bulba

8 a.k.a. Ncux, (hereafter "[14] **SELEZNEV**"), is a Vendor in the Carder.su organization of dumps.

9 [14] **SELEZNEV** sells members such a large volume of product that he has created an automated  
 10 website, which he advertises on the Carder.su organization's websites. [14] **SELEZNEV**'s  
 11 automated website allows members to log into and purchase stolen and otherwise stolen credit card  
 12 account data without personal interaction with [14] **SELEZNEV**. [14] **SELEZNEV**'s website has  
 13 a simple interface that allows members to search for the particular type of credit card information  
 14 they want to buy, add the number of accounts they wish to purchase to their "shopping cart" and then  
 15 check out. Payment of funds is automatically deducted from an already-established account funded  
 16 through L. R., an on-line digital currency payment system. Upon checking out, the purchased credit  
 17 card account data is available for the members to download. [14] **SELEZNEV** sells each stolen  
 18 account number for approximately twenty dollars (\$20). [14] **SELEZNEV**'s criminal activities in  
 19 furtherance of the enterprise include, but are not limited to, conspiracy to possess and possession of  
 20 fifteen (15) or more counterfeit and unauthorized access devices.

21 (xiii) Defendant [15] **QASIR MUKHTAR** a.k.a. Caliber, (hereafter "[15]

22 **MUKHTAR**"), is a Vendor in the Carder.su organization of counterfeit plastic and counterfeit credit  
 23 cards, as well as counterfeit holograms and signature panels that can be used to manufacture  
 24 counterfeit credit cards. [15] **MUKHTAR** sells blank counterfeit plastic cards to members for  
 25 fifteen dollars (\$15) each and embossed counterfeit credit cards for twenty dollars (\$20) each.  
 26 Counterfeit credit cards with a photograph or chip on them cost twenty five dollars (\$25) un-

1 embossed, and thirty dollars (\$30) embossed. [15] **MUKHTAR** sells counterfeit cards with both  
 2 chip and photograph for thirty dollars (\$30) un-embossed, and thirty five (\$35) embossed.  
 3 [15] **MUKHTAR**'s prices for the counterfeit holograms vary by the quantity purchased.

4 [15] **MUKHTAR**'s criminal activities in furtherance of the enterprise include, but are not limited  
 5 to, possession of fifteen (15) or more counterfeit and unauthorized access devices, and conspiracy  
 6 to possess and possession of device making equipment.

7 (xiv) Defendant [16] **ROY AYAD** a.k.a. RABIE AYAD a.k.a. Patistota,  
 8 (hereafter "[16] **AYAD**"), is a Vendor of CVVs in the Carder.su organization. [16] **AYAD** sells the  
 9 CVVs through an automated website, which he advertises on the Carder.su organization's websites.  
 10 [16] **AYAD**'s website allows members to view his products by looking up specific bank  
 11 identification numbers ("BINs"), and by looking up the geographical location of the victim CVVs.  
 12 [16] **AYAD** also sells a lookup service to members that they can use to make sure the CVVs are  
 13 valid at the time the member purchases them. [16] **AYAD**'s criminal activities in furtherance of the  
 14 enterprise include, but are not limited to, unlawful transfer and use of a means of identification, and  
 15 possession of fifteen (15) or more counterfeit and unauthorized access devices.

16 (xv) Defendant [17] **MINA MORRIS** a.k.a. Source, (hereafter "[17]  
 17 **MORRIS**"), is a Vendor of dumps in the Carder.su organization, which he sells to members at prices  
 18 ranging from twelve dollars (\$12) to one hundred fifty dollars (\$150), depending on the quantity  
 19 purchased and the geographical location from which the dumps originate. [17] **MORRIS** sells  
 20 dumps from the United States as the least expensive, and dumps from Europe, the Middle East and  
 21 Asia as the most expensive. **MORRIS** also has an automated website, which he advertises on the  
 22 Carder.su organization's websites. [17] **MORRIS**' website allows members to look up dumps by  
 23 BIN to purchase accounts issued from a particular financial institution. [17] **MORRIS**' criminal  
 24 activities in furtherance of the enterprise include, but are not limited to, conspiracy to possess and  
 25 possession of fifteen (15) or more counterfeit and unauthorized access devices.

26

(xvi) Defendant [18] **RACHID IDAALI** a.k.a. C4rd3R, (hereafter “[18] **IDAALIIDAALI** sells the CVVs to members through his automated website. [18] **IDAALI** advertises his website on the Carder.su organization’s websites, and his advertisement includes his Universal Identification Number (“UIN”), which facilitates member-to-member “ICQ” chats. ICQ chat is a free instant messaging electronic communication service provided by ICQ, Inc., a subsidiary of AOL. [18] **IDAALI** also sells Fullz, which include full name, billing address, credit card account number, expiration date, Social Security number, mother’s maiden name, date of birth, the security code on the rear of a credit card, and occasionally the PIN. [18] **IDAALI**’s criminal activities in furtherance of the enterprise include, but are not limited to, possession of fifteen (15) or more counterfeit and unauthorized access devices.

( xviii) Defendant [20] **SERGEI LITVINENKO** a.k.a. Dorbik a.k.a.  
Matad0r, (hereafter “[20] LITVINENKO”), is a Vendor in the Carder.su organization of “bullet  
proof hosting” services and infrastructure for criminal websites, including the Carder.su  
organization’s websites. “Bullet proof hosting” is a term of art utilized by carders to describe an  
Internet Service Provider (“ISP”) that will allow an individual to run a website that contains illegal  
content, such as a fake website utilized for “phishing,” a criminal carding forum (e.g., the Carder.su  
organization’s websites), or an automated website that sells dumps. “Phishing” is targeted method  
of obtaining personal or financial information, typically done by the use of emails or counterfeit web  
pages presented to a potential victim that induces the victim under false pretenses to give their

1 information to the attacker. [20] LITVINENKO's criminal activities in furtherance of the enterprise  
 2 include, but are not limited to, conspiracy to possess fifteen (15) or more counterfeit and  
 3 unauthorized access devices.

4 (xix) Defendant [30] JOHN DOE 3 a.k.a. Gruber (hereafter "[30]  
 5 GRUBER") is a Vendor of counterfeit identification documents in the Carder.su organization."  
 6 [30] GRUBER manufactures and sells counterfeit drivers licenses to members for the states of  
 7 California, Texas, Wisconsin, Ohio, Rhode Island, Nevada, Pennsylvania, Illinois, Florida,  
 8 Louisiana, Arizona, Hawaii, South Carolina, Georgia and New Jersey, as well as British Columbia,  
 9 Canada. The prices range from one hundred fifty dollars (\$150) to two hundred dollars (\$200),  
 10 depending on the state. [30] GRUBER's criminal activities in furtherance of the enterprise include,  
 11 but are not limited to, conspiracy to produce counterfeit identification documents, and possession  
 12 of fifteen (15) or more counterfeit and unauthorized access devices.

13 (xx) Defendant [32] JOHN DOE 5 a.k.a. Elit3 (hereafter "[32] ELIT3")  
 14 is a Vendor in the Carder.su organization of Fullz, which include full name, billing address, credit  
 15 card account number, expiration date, PIN, Social Security number, mother's maiden name, date of  
 16 birth and the security code on the rear of a credit card, at prices of five dollars (\$5) to seven dollars  
 17 (\$7) each, with a minimum order of fifteen dollars (\$15). [32] ELIT3 also sells Enroll/COBs, which  
 18 includes the victim's full name, billing address, credit card account number, expiration date, Social  
 19 Security number, mother's maiden name, date of birth, the security code on the rear of a credit card,  
 20 driver license number, mother's date of birth, checking account number, routing number and the  
 21 username and password to access the account online, for fifteen dollars (\$15) each or twenty dollars  
 22 (\$20) each, if the Enroll also includes the PIN. [32] ELIT3's criminal activities in furtherance of  
 23 the enterprise include, but are not limited to, unlawful transfer and use of a means of identification.

24 (xi) Defendant [33] JOHN DOE 6 a.k.a. Fozzy (hereafter "[33]  
 25 FOZZY") is a Vendor of dumps in the Carder.su organization, whose prices range from twelve  
 26 dollars (\$12) to one hundred dollars (\$100), depending on the quantity purchased and the

1 geographical location from which the dumps originate. Dumps from the United States are sold to  
 2 members as the least expensive and dumps from Europe are sold as the most expensive.

3 [33] FOZZY's criminal activities in furtherance of the enterprise include, but are not limited to,  
 4 possession of fifteen (15) or more counterfeit and unauthorized access devices.

5 (xxii) Defendant [34] JOHN DOE 7 a.k.a. .Vitrum a.k.a. Lermenov  
 6 (hereafter "[34].VITRUM") is a Vendor of dumps in the Carder.su organization, whose prices range  
 7 from fifteen dollars (\$15) to one hundred dollars (\$100), depending on the quantity purchased and  
 8 the geographical location from which the dumps originate. Dumps from the United States are sold  
 9 to members as the least expensive and dumps from Europe are sold as the most expensive.

10 [34].VITRUM's criminal activities in furtherance of the enterprise include, but are not limited to,  
 11 possession of fifteen (15) or more counterfeit and unauthorized access devices.

12 (xxiii) Defendant [35] ANDREI BOLOVAN a.k.a. Panther a.k.a. Euphoric  
 13 a.k.a. Darkmth, (hereafter "[35] BOLOVAN"), is a Vendor of dumps in the Carder.su organization,  
 14 whose least expensive prices begin at twenty dollars (\$20) for United States dumps. [35]  
 15 BOLOVAN's criminal activities in furtherance of the enterprise include, but are not limited to,  
 16 possession of fifteen (15) or more counterfeit and unauthorized access devices.

17 (xxiv) Defendant [36] JOHN DOE 8 a.k.a. TM (hereafter "[36] TM") is  
 18 a Vendor of dumps and CVVs in the Carder.su organization, which he sells to members through his  
 19 automated website. [36] TM advertises his automated website on the Carder.su organization's  
 20 websites. [36] TM's criminal activities in furtherance of the enterprise include, but are not limited  
 21 to, possession of fifteen (15) or more counterfeit and unauthorized access devices.

22 (xxv) Defendant [37] JOHN DOE 9 a.k.a. Zo0mer a.k.a. Deputat (hereafter  
 23 "[37] ZO0MER") is a Vendor in the Carder.su organization of: stolen PayPal accounts, which  
 24 include a victim's username and the password necessary to access the account; Proxies, which are  
 25 achieved by bouncing from one computer to another to hide a member's true originating IP address;  
 26 Fullz; and Credit Card Checking and Information Lookups, which include Social Security numbers,

1 dates of birth and mothers' maiden names. [37] **ZO0MER** provides this service to members through  
 2 an automated website, which he advertises on "the Carder.su organization's" websites. [37]  
 3 **ZO0MER** is also a Vender of dumps, which he sells to members at prices ranging from fifteen  
 4 dollars (\$15) to one hundred fifty dollars (\$150), depending on the quantity purchased and the  
 5 geographical location from which the dumps originate. [37] **ZO0MER** sell dumps from the United  
 6 States as the least expensive and dumps from Europe as the most expensive. [37] **ZO0MER**'s  
 7 criminal activities in furtherance of the enterprise include, but are not limited to, possession of fifteen  
 8 (15) or more counterfeit and unauthorized access devices.

9 (xxvi) Defendant [38] **JOHN DOE 10** a.k.a. Centurion (hereafter "[38]  
 10 **CENTURION**") is a Vendor of dumps in the Carder.su organization, which he sells to members at  
 11 prices ranging from fifteen dollars (\$15) to eighty dollars (\$80), depending on the quantity purchased  
 12 and the geographical location from which the dumps originate. [38] **CENTURION** sells dumps from  
 13 the United States as the least expensive and dumps from Europe as the most expensive.  
 14 [38] **CENTURION**'s criminal activities in furtherance of the enterprise include, but are not limited  
 15 to, possession of fifteen (15) or more counterfeit and unauthorized access devices.

16 (xxvii) Defendant [39] **JOHN DOE 11** a.k.a. Consiglieri (hereafter "[39]  
 17 **CONSIGLIORI**") is a Vendor of dumps in the Carder.su organization and sells counterfeit blank  
 18 plastic cards to members for fifteen dollars (\$15) each, and embossed counterfeit credit cards for  
 19 twenty dollars (\$20) each. "[39] **CONSIGLIORI**'s criminal activities in furtherance of the  
 20 enterprise include, but are not limited to, possession of device-making equipment.

21 e. Members - An individual seeking membership in the Carder.su organization  
 22 must successfully complete a number of security features designed to protect the organization from  
 23 infiltration by law enforcement or members of rival criminal organizations. One such security  
 24 feature requires a prospective member to be formally vouched for by at least two other members in  
 25 good standing. Once membership is granted, members use the Carder.su organization's websites as  
 26 "virtual clubhouses" to gather together with other members to share information and to solicit and

1 recruit other members to engage in activities, including but not limited to criminal activities, in order  
 2 to achieve the common objectives of the enterprise. Members use the Carder.su organization's  
 3 vendors, by way of the organization's websites, to buy products and services, such as, credit card  
~~4 dumps, false identification documents, and other contraband.~~ Members share information through  
 5 the organization's websites to teach other members how to engage in new criminal activities and  
 6 how best to perpetuate existing criminal schemes. Members are periodically appointed by the  
 7 Administrator to act as a Reviewer. Reviewers examine and test products and services that members  
 8 of the Carder.su organization desire to advertise and sell on the Carder.su organization's websites.  
 9 Individual disputes between members are settled by the Administrator and Moderators. If a dispute  
 10 is decided adversely to a particular Member, if Members are found to be disloyal to the Carder.su  
 11 organization, or if Members behave in a manner that impedes achieving the common objectives of  
 12 the enterprise, the Administrator will mete out punishments, up to and including, stripping them of  
 13 their memberships and barring them from accessing the Carder.su organization's websites.

14 ( i) Defendant [21] **MICHAEL LOFTON** a.k.a. Killit a.k.a. Lofeazy,  
 15 (hereafter “[21] LOFTON”), is a member of the Carder.su organization. [21] LOFTON participates  
 16 in the enterprise, acting under the direction of and in concert with other members of the enterprise  
 17 in carrying out unlawful and other activities in furtherance of the conduct of the enterprise’s affairs.  
 18 [21] LOFTON’s criminal activities in furtherance of the enterprise include, but are not limited to,  
 19 production and trafficking in counterfeit identification documents, and unlawful transfer and use of  
 20 a means of identification.

21 ( ii) Defendant [22] **SHIYANG GOU** a.k.a. Cder, (hereafter “[22]  
 22 GOU”), is a member of the Carder.su organization. [22] GOU participates in the enterprise, acting  
 23 under the direction of and in concert with other members of the enterprise in carrying out unlawful  
 24 and other activities in furtherance of the conduct of the enterprise’s affairs. [22] GOU’s criminal  
 25 activities in furtherance of the enterprise include, but are not limited to, production and trafficking

in counterfeit identification documents, and possession of fifteen (15) or more counterfeit and unauthorized access devices.

(iii) Defendant [23] DAVID RAY CAMEZ a.k.a. Bad Man a.k.a. Doctorsex, (hereafter “[23] CAMEZ”), is a member of the Carder.su organization. [23] CAMEZ participates in the enterprise, acting under the direction of and in concert with other members of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the enterprise’s affairs. [23] CAMEZ’s criminal activities in furtherance of the enterprise include, but are not limited to, production and trafficking in counterfeit identification documents, possession of fifteen (15) or more counterfeit and unauthorized access devices, and conspiracy to possess device-making equipment.

(iv) Defendant [24] **CAMERON HARRISON** a.k.a. Kilobit, (hereafter “[24] **HARRISON**”), is a member of the Carder.su organization. [24] **HARRISON** participates in the enterprise, acting under the direction of and in concert with other members of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the enterprise’s affairs. [24] **HARRISON**’s criminal activities in furtherance of the enterprise include, but are not limited to, production and trafficking in counterfeit identification documents, possession of fifteen (15) or more counterfeit and unauthorized access devices, and unlawful transfer and use of a means of identification.

( v) Defendant [25] **ALEKSANDAR BESAROVIC** a.k.a. Qiller, (hereafter “[25] **BESAROVIC**”), is a member of the Carder.su organization. [25] **BESAROVIC** participates in the enterprise, acting under the direction of and in concert with other members of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the enterprise’s affairs. [25] **BESAROVIC**’s criminal activities in furtherance of the enterprise include, but are not limited to, production and trafficking in counterfeit identification documents, conspiracy to produce and traffic in counterfeit identification documents, and possession of fifteen (15) or more counterfeit and unauthorized access devices.

(vi) Defendant [26] **DUVAUGHN BUTLER** a.k.a. Mackmann, (hereafter “[26] **BUTLER**”), is a member of the Carder.su organization. [26] **BUTLER** participates in the enterprise, acting under the direction of and in concert with other members of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the enterprise’s affairs. [26] **BUTLER**’s criminal activities in furtherance of the enterprise include, but are not limited to, using and trafficking in unauthorized access devices, possession of fifteen (15) or more counterfeit and unauthorized access devices, and conspiracy to possess device-making equipment.

(vii) Defendant [27] **FREDRICK THOMAS** a.k.a 1Stunna, (hereafter “[27] THOMAS”), is a member of the Carder.su organization. [27] THOMAS participates in the enterprise, acting under the direction of and in concert with other members of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the enterprise’s affairs. [27] THOMAS’s criminal activities in furtherance of the enterprise include, but are not limited to, unlawful transfer and use of a means of identification, and possession of fifteen (15) or more counterfeit and unauthorized access devices.

15 ( viii) Defendant [28] JOHN DOE 1 a.k.a Senna071, (hereafter “[28]  
16 SENNA071”) is a member of the Carder.su organization. As such, the defendant participates in the  
17 enterprise, acting under the direction of and in concert with other members of the enterprise in  
18 carrying out unlawful and other activities in furtherance of the conduct of the enterprise’s affairs.  
19 “[28] SENNA071’s criminal activities in furtherance of the enterprise include, but are not limited  
20 to, production and trafficking in counterfeit identification documents, and conspiracy to produce and  
21 traffic in counterfeit identification documents.

22 ( ix) Defendant [29] JOHN DOE 2 a.k.a. Morfiy, (hereafter “[29]  
23 MORFIY”), is a member of the Carder.su organization. As such, the defendant participates in the  
24 enterprise, acting under the direction of and in concert with other members of the enterprise in  
25 carrying out unlawful and other activities in furtherance of the conduct of the enterprise’s affairs.  
26 [29] MORFIY’s criminal activities in furtherance of the enterprise include, but are not limited to,

1 production and trafficking in counterfeit identification documents, conspiracy to produce and traffic  
2 in counterfeit identification documents, and conspiracy to possess device-making equipment.

3

4 **COUNT ONE**

5 **Participate in a Racketeer Influenced Corrupt Organization**

6 **THE RACKETEERING VIOLATION**

7 1. Paragraphs 1 through 5 of the General Allegations Section are hereby realleged and  
8 incorporated as if fully set forth herein.

9 2. From a date unknown but not later than on or about November 22, 2005, through on  
10 or about June 2011, with both dates being approximate and inclusive, in the District of Nevada and  
11 elsewhere,

12 [1] ZOLOTAREV;  
13 [2] LOPATIN;  
14 [3] KOSTYUKOV;  
15 [4] BOOZER III;  
16 [5] WONG;  
17 [6] MONTECALVO;  
18 [7] WANG;  
19 [8] MAHMOUD;  
20 [9] SMITH;  
21 [10] HAGGERTY;  
22 [11] AJAYI;  
23 [12] ION;  
24 [13] GEORGIEVSKI;  
25 [14] SELEZNEV;  
26 [15] MUKHTAR;

[16] AYAD;  
[17] MORRIS;  
[18] IDAALI;  
[19] MUSLIU;  
[21] LOFTON;  
[22] GOU;  
[23] CAMEZ;  
[24] HARRISON;  
[25] BESAROVIC;  
[26] BUTLER;  
[27] THOMAS;  
[28] SENNA071;  
[29] MORFIY;  
[30] GRUBER;

[31] MAXXTRO;  
[32] ELIT3;  
[33] FOZZY;  
[34] VITRUM;  
[35] BOLOVAN;  
[36] TM;  
[37] ZO0MER;  
[38] CENTURION; and  
[39] CONSIGLIORI;

the defendants herein, including others known and unknown, being persons who are members of, employed by, and associated with the Carder.su organization described above, an enterprise engaging in, and the activities of which affects interstate and foreign commerce, unlawfully, and knowingly did conduct and participate, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity, that is, through the commission of the following acts, more fully described in Racketeering Acts 1 through 109, below.

### **THE PATTERN OF RACKETEERING ACTIVITY**

3. The pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and (5), consisted of:

#### **RACKETEERING ACTS INVOLVING STOLEN MEANS OF IDENTIFICATION AND COUNTERFEIT IDENTIFICATION DOCUMENTS**

##### **Racketeering Acts 1 through 15**

###### **Unlawful Trafficking in and Production of False Identification Documents**

4. On or about each of the dates set forth below, in the State and Federal District of Nevada, and elsewhere,

[3] KOSTYUKOV;  
[4] BOOZER III;  
[5] WONG;  
[6] MONTECALVO;  
[21] LOFTON;  
[22] GOU;  
[23] CAMEZ;  
[24] HARRISON;  
[25] BESAROVIC;  
[28] SENNA071; and  
[29] MORFIY;

1 defendants herein, together with and aiding and abetting one another and other members and  
 2 associates of the Carder.su organization, including others known and unknown, did knowingly and  
 3 without lawful authority produce, and did cause others to produce, false identification documents,  
 4 which were transported in the mail in the course of the unauthorized production, in and affecting  
 5 interstate and foreign commerce, and the offense involved the production and transfer of false  
 6 identification documents that are and appear to be driver's licenses, with each false identification  
 7 document set forth below constituting a separate violation of Title 18, United States Code, Section  
 8 1028(a)(1), and Title 18, United States Code, Section 2:

<u>RA</u>	<u>Defendant</u>	<u>Date</u>	<u>Type of Document</u>	<u>Name</u>
1	[21] LOFTON	January 23, 2009	NV Driver's License	M. Webb
2	[3] KOSTYUKOV	April 24, 2009	NV Driver's License	A. Kostyukov
3	[4] BOOZER III	May 19, 2009	TX Driver's License	M. Wright
4	[22] GOU	May 26, 2009	NV Driver's License	J. Wang
5	[23] CAMEZ	May 28, 2009	NV Driver's License	J. Henry
6	[3] KOSTYUKOV	June 30, 2009	NV Driver's License	M. Ulitin
7	[5] WONG	September 14, 2009	NY Driver's License	D. Pena
8	[28] SENNA071	October 6, 2009	NV Driver's License	L. Sadik
9	[3] KOSTYUKOV	October 13, 2009	WA Driver's License	R. Sadriev
10	[28] SENNA071	October 20, 2009	NV Driver's License	A. Davis
11	[6] MONTECALVO	November 9, 2009	VA Driver's License	E. Montecalvo
12	[29] MORFIY	November 19, 2009	NV Driver's License	F. Grolsh
13	[21] LOFTON	February 11, 2010	NV Driver's License	K. Marshall
14	[24] HARRISON	February 25, 2010	GA Driver's License	D. Mock
15	[25] BESAROVIC	April 7, 2011	GA Driver's License	D. Vasic

**Racketeering Act 16**  
**Attempt to Unlawfully Produce False Identification Documents**

3       5. From on or about April 16, 2011, until on or after May 18, 2011, in the State and  
4 Federal District of Nevada; and elsewhere, [30] **GRUBER**, defendant herein, together with other  
5 members and associates of the Carder.su organization, including others known and unknown, did  
6 knowingly and without lawful authority attempt to produce, and did attempt to cause others to  
7 produce, false identification documents, in and affecting interstate and foreign commerce, and the  
8 offense involved the production and transfer of false identification documents that are and appear  
9 to be approximately two (2) Florida driver's licenses, in violation of Title 18, United States Code,  
10 Sections 1028(a)(1), and (f).

## Racketeering Act 17

13       6. Beginning on an unknown date, but not later than February 1, 2010, and continuing  
14 to on or about February 5, 2010, in the States of Florida, New Hampshire, and elsewhere,  
15 [28] SENNA071, defendant herein, together with other members and associates of the Carder.su  
16 organization, including others known and unknown, did knowingly and without lawful authority  
17 attempt to produce, and did attempt to cause others to produce, false identification documents, in and  
18 affecting interstate and foreign commerce, and the offense involved the production and transfer of  
19 false identification documents that are and appear to be a driver's license, bearing the name S.  
20 Salman, all in violation of Title 18, United States Code, Sections 1028(a)(1), and (f).

## Racketeering Act 18

22       7. Beginning on or about August 20, 2010, and continuing to on or about August 25,  
23 2010, in the State of Nevada, and elsewhere, the defendants, [30] **GRUBER** and [21] **LOFTON**,  
24 together with other members and associates of the Carder.su organization, including others unknown,  
25 did unlawfully, knowingly and intentionally combine, conspire and agree among themselves, and

1 with others, to commit offenses against the laws of the United States, namely to knowingly and  
2 without lawful authority produce a false identification document, in and affecting interstate and  
3 foreign commerce, and the offense involved the production and transfer of a false identification  
4 document that is and appears to be a California driver's license, bearing the name L. Kipnes, all in  
5 violation of Title 18, United States Code, Sections 1028(a)(1), and (f).

**Racketeering Act 19**  
**Conspiracy to Unlawfully Produce False Identification Documents**

8        Beginning on an unknown date, but not later than May 22, 2010, and continuing to  
9    on or about June 1, 2010, in the States of Iowa, Illinois, California, and elsewhere, the defendants,  
10   [25] **BESAROVIC**, and [10] **HAGGERTY**, together with other members and associates of the  
11   Carder.su organization, including others known and unknown, did unlawfully, knowingly and  
12   intentionally combine, conspire and agree among themselves, and with others, to commit offenses  
13   against the laws of the United States, namely to knowingly and without lawful authority produce a  
14   false identification document, in and affecting interstate and foreign commerce, and the offense  
15   involved the production and transfer of a false identification document that is and appears to be a  
16   driver's license, bearing the name P. Petrovic, all in violation of Title 18, United States Code,  
17   Sections 1028(a)(1), and (f).

## Racketeering Act 20

19       9. Beginning on an unknown date, but not later than June 8, 2010, and continuing to on  
20 or about June 27, 2010, in the State of California, and elsewhere, the defendants, [29] **MORFIY**,  
21 and [10] **HAGGERTY**, together with other members and associates of the Carder.su organization,  
22 including others unknown, did unlawfully, knowingly and intentionally combine, conspire and agree  
23 among themselves, and with others, to commit offenses against the laws of the United States, namely  
24 to knowingly and without lawful authority produce a false identification document, in and affecting  
25 interstate and foreign commerce, and the offense involved the production and transfer of a false

1 identification document that is and appears to be a Texas driver's license, bearing the name A. Ladd,  
2 all in violation of Title 18, United States Code, Sections 1028(a)(1), and (f).

**Racketeering Act 21**  
**Conspiracy to Unlawfully Produce False Identification Documents**

5        10. Beginning on an unknown date, but not later than June 18, 2010, and continuing to  
6 on or about June 25, 2010, in the States of New York, California, and elsewhere, the defendant,  
7 [10] **HAGGERTY**, together with other members and associates of the Carder.su organization,  
8 including others known and unknown, did unlawfully, knowingly and intentionally combine,  
9 conspire and agree among themselves, and with others, to commit offenses against the laws of the  
10 United States, namely to knowingly and without lawful authority produce a false identification  
11 document, in and affecting interstate and foreign commerce, and the offense involved the production  
12 and transfer of false identification documents that are and appears to be two (2) driver's licenses, one  
13 bearing the name R. Harrison, and one bearing the name A. Huber, all in violation of Title 18, United  
14 States Code, Sections 1028(a)(1), and (f).

**Racketeering Act 22**

17        11. Beginning on or about August 22, 2008, and continuing to on or about March 23,  
18        2009, in the State of Nevada, and elsewhere, the defendant [1] ZOLOTAREV, together with other  
19        members and associates of the Carder.su organization, including others known and unknown, did  
20        unlawfully, knowingly and intentionally combine, conspire and agree among themselves, and with  
21        others, to commit offenses against the laws of the United States, namely to knowingly transfer and  
22        cause others to transfer false identification documents, knowing that such documents were produced  
23        without lawful authority, and the production and transfer of the false identification documents was  
24        in and affecting interstate and foreign commerce, and the offense involved the production and  
25        transfer of false identification documents that are and appear to be driver's licenses, all in violation  
26        of Title 18, United States Code, Sections 1028(a)(2), and (f).

### Racketeering Act 23

3       12. On or about January 11, 2011, in the States of Virginia, West Virginia, Michigan,  
4 California, and elsewhere, the defendant [6] **MONTECALVO**, together with other members and  
5 associates of the Carder.su organization, including others known and unknown, did knowingly  
6 produce, transfer and possess a document-making implement and authentication features, to wit:  
7 laminates used in the production of counterfeit Illinois driver's licences; and Photoshop templates  
8 used to create counterfeit Maryland driver's licenses and counterfeit Florida driver's licenses; with  
9 the intent such document-making implements and authentication features would be used in the  
10 production of a false identification document, or used in conjunction with another document-making  
11 implement or authentication feature which would be so used, and the production, transfer and  
12 possession of the document-making implement and authentication feature was in and affected  
13 interstate and foreign commerce, all in violation of Title 18, United States Code, Section 1028 (a)(5).

**Racketeering Act 24**

16       13. On or about March 15, 2009, in the in the State of Connecticut and elsewhere,  
17 [5] **WONG**, defendant herein, together with other members and associates of the Carder.su  
18 organization, including others known and unknown, did knowingly and intentionally combine,  
19 conspire and agree among themselves, and with others, to commit offenses against the laws of the  
20 United States, namely to knowingly transfer, possess and use, in and effecting interstate and foreign  
21 commerce, without lawful authority, one or more means of identification of other persons, including  
22 but not limited to, stolen credit and debit card account numbers, to wit: a Visa credit card account,  
23 number ending in X-6329, with the intent to commit and to aid and abet the commission of and in  
24 connection with any unlawful activity that constitutes a violation of Federal law, to wit: Wire Fraud  
25 in violation of Title 18, United States Code, Section 1343, and as a result of the offense the  
defendants and any other individual committing the offense, obtained something of value

1 aggregating one thousand dollars, (\$1,000) or more in a one-year period, that is, at least two  
 2 thousand dollars (\$2,000.00) in United States currency, from the Foxwoods Resort, Preston,  
 3 Connecticut, all in violation of Title 18, United States Code, Sections 1028(a)(7), and (f).

**Racketeering Acts 25 through 36**

**Unlawful Transfer, Possession, and Use of A Means of Identification**

6       14. On or about each of the dates set forth below, in the States of Nevada, Georgia,  
 7 California, New York, Missouri, and elsewhere,

8                   [8] MAHMOUD;  
 9                   [12] ION;  
 10                  [16] AYAD;  
 11                  [21] LOFTON;  
 12                  [24] HARRISON;  
 13                  [27] THOMAS;  
 14                  [31] MAXXTRO; and  
 15                  [32] ELIT3;

16 defendants herein, together with other members and associates of the Carder.su organization,  
 17 including others known and unknown, did knowingly transfer, possess and use, in and effecting  
 18 interstate and foreign commerce, without lawful authority, one or more means of identification of  
 19 other persons, including but not limited to, stolen and otherwise stolen credit and debit card account  
 20 numbers, account holders' names, dates of birth, Social Security numbers, addresses, and telephone  
 21 numbers, with the intent to commit and to aid and abet the commission of and in connection with  
 22 any unlawful activity that constitutes a violation of Federal law, to wit: Wire Fraud in violation of  
 23 Title 18, United States Code, Section 1343, with each instance set forth below constituting a separate  
 24 violation of Title 18, United States Code, Section 1028(a)(7):

<u>RA</u>	<u>Defendant</u>	<u>Date</u>	<u>Account Number</u>	<u>Name</u>
25	[31] MAXXTRO	November 25, 2006	X-5696	K. Kehoe
26	[8] MAHMOUD	October 19, 2007	X-5598	B. Detrich
27	[31] MAXXTRO	February 28, 2008	X-1914	D. Stickler
28	[24] HARRISON	June 26, 2008	X-6433	D. Olsen

1	29	[32] ELIT3 & [21] LOFTON	January 29, 2009	X-5462	T. Biggs
2	30	[27] THOMAS & [8] MAHMOUD	March 8, 2009	X-5580	D. Ewart
3	31	[32] ELIT3	October 30, 2009	X-4478	T. Miska
4	32	[32] ELIT3	November 10, 2009	X-8237	S. Smith
5	33	[27] THOMAS & [32] ELIT3	November 12, 2009	X-5637	J. Smith
6	34	[32] ELIT3	November 13, 2009	X-5002	S. McDonald
7	35	[12] ION	August 3, 2010	X-3337	D. Bossman
8	36	[16] AYAD	September 16, 2010	X-5079	K. Young

**RACKETEERING ACTS INVOLVING  
COUNTERFEIT AND UNAUTHORIZED ACCESS DEVICES**

**Racketeering Act 37  
Using and Trafficking in Unauthorized Access Devices**

15. On or about March 1, 2011, in the State and Federal District of Nevada, and elsewhere, [26] BUTLER, defendant herein, together with other members and associates of the Carder.su organization, including others unknown, did knowingly and with intent to defraud, traffic in and use an unauthorized access device, to wit: a Chase Bank MasterCard credit card account, number ending in X-8088, which was stolen and obtained with the intent to defraud, and by such conduct did, on or about that same date, obtain things of value in excess of one thousand dollars (\$1,000.00), that is, approximately one thousand fifty three dollars (\$1,053.00) in goods and merchandise, from Walmart, store number 2593, in or around Las Vegas, Nevada, with said trafficking and use in and affecting interstate commerce, all in violation of Title 18, United States Code, Section 1029(a)(2).

**Racketeering Acts 38 through 97**  
**Possession of Fifteen or More Unauthorized Access Devices**

16. On or about each of the dates set forth below, in the State and Federal District of Nevada, and elsewhere, \_\_\_\_\_

- [1] ZOLOTAREV;  
[2] LOPATIN;  
[4] BOOZER III;  
[6] MONTECALVO;  
[7] WANG;  
[8] MAHMOUD;  
[9] SMITH;  
[10] HAGGERTY;  
[11] AJAYI;  
[12] ION;  
[13] GEORGIEVSKI;  
[14] SELEZNEV;  
[15] MUKHTAR;  
[16] AYAD;  
[17] MORRIS;  
[18] IDAALI;  
[19] MUSLIU;  
[22] GOU;  
[23] CAMEZ;  
[24] HARRISON;  
[25] BESAROVIC;  
[26] BUTLER;  
[27] THOMAS;  
[30] GRUBER;  
[31] MAXXTRO;  
[33] FOZZY;  
[34] .VITRUM;  
[35] BOLOVAN;  
[36] TM;  
[37] ZO0MER; and  
[38] CENTURION;

defendants herein, together with other members and associates of the Carder.su organization, including others known and unknown, knowingly and with intent to defraud, did possess fifteen or more unauthorized access devices, that is, stolen credit and debit card account numbers issued to persons other than the defendants, and which are issued, owned, managed and controlled by a financial institution, account issuer, or credit card system member within the jurisdiction of the

United States, in and affecting interstate and foreign commerce, with each instance set forth below constituting a separate violation of Title 18, United States Code, Sections 1029(a)(3), and (h):

<u>RA</u>	<u>Defendant</u>	<u>Date</u>	<u>Approximate No. Devices</u>
38	[1] ZOLOTAREV & [31] MAXXTRO	February 13, 2007	20
39	[1] ZOLOTAREV & [33] FOZZY;	February 15, 2007	17
40	[7] WANG	April 10, 2007	more than 490
41	[8] MAHMOUD	February 22, 2008	22
42	[30] GRUBER & [34] .VITRUM	February 23, 2008	25
43	[34] .VITRUM	May 7, 2008	40
44	[7] WANG	February 2, 2009	30
45	[8] MAHMOUD	March 9, 2009	25
46	[6] MONTECALVO	January 21, 2010	50
47	[6] MONTECALVO	April 5, 2010	220
48	[26] BUTLER & [9] SMITH	April 14, 2010	15
49	[25] BESAROVIC	May 16, 2010	17
50	[10] HAGGERTY	May 27, 2010	20
51	[10] HAGGERTY	June 2, 2010	40
52	[23] CAMEZ	June 7, 2010	30
53a.	[4] BOOZER III	June 9, 2010	200
53b.	[4] BOOZER III	June 10, 2010	50
54	[11] AJAYI	July 15, 2010	50
55	[11] AJAYI	July 21, 2010	146
56	[7] WANG	July 26, 2010	23
57	[11] AJAYI	July 27, 2010	99

	<u>RA</u>	<u>Defendant</u>	<u>Date</u>	<u>Approximate No. Devices</u>
1	58	[22] <b>GOU</b>	July 29, 2010	34
2	59	[12] <b>ION &amp;</b> [35] <b>BOLOVAN</b>	August 30, 2010	22
3	60	[24] <b>HARRISON &amp;</b> [35] <b>BOLOVAN</b>	September 7, 2010	21
4	61	[12] <b>ION</b>	October 15, 2010	more than 50
5	62	[13] <b>GEORGIEVSKI</b>	October 15, 2010	more than 36
6	63	[22] <b>GOU</b>	January 12, 2011	69
7	64	[14] <b>SELEZNEV</b>	January 20, 2011	29
8	65	[35] <b>BOLOVAN</b>	February 11, 2011	69
9	66	[27] <b>THOMAS</b>	March 5, 2011	28
10	67	[15] <b>MUKHTAR</b>	March 6, 2011	46
11	68	[11] <b>AYAD</b>	March 15, 2011	15
12	69	[36] <b>TM</b>	March 16, 2011	20
13	70	[14] <b>SELEZNEV</b>	March 18, 2011	20
14	71	[37] <b>ZO0MER</b>	March 18, 2011	20
15	72	[17] <b>MORRIS</b>	March 18, 2011	20
16	73	[18] <b>IDAALI</b>	March 23, 2011	20
17	74	[2] <b>LOPATIN</b>	March 24, 2011	18
18	75	[11] <b>AYAD</b>	March 24, 2011	20
19	76	[33] <b>FOZZY</b>	March 24, 2011	22
20	77	[36] <b>TM</b>	March 24, 2011	20
21	78	[37] <b>ZO0MER</b>	March 24, 2011	23
22	79	[38] <b>CENTURION</b>	March 24, 2011	23
23	80	[18] <b>IDAALI</b>	March 26, 2011	60
24	81	[34] <b>.VITRUM</b>	March 28, 2011	20

	<u>RA</u>	<u>Defendant</u>	<u>Date</u>	<u>Approximate No. Devices</u>
1	82	[38] CENTURION	March 28, 2011	74
2	83	[33] FOZZY	March 28, 2011	22
3	84	[35] BOLOVAN	March 28, 2011	20
4	85	[2] LOPATIN	March 29, 2011	21
5	86	[35] BOLOVAN	April 6, 2011	38
6	87	[35] BOLOVAN	April 8, 2011	20
7	88	[2] LOPATIN	April 10, 2011	21
8	89	[18] IDAALI	April 11, 2011	20
9	90	[36] TM	April 11, 2011	20
10	91	[37] ZO0MER	April 11, 2011	19
11	92	[19] MUSLIU	April 12, 2011	49
12	93	[38] CENTURION	April 12, 2011	22
13	94	[19] MUSLIU	April 22, 2011	12,710
14	95	[17] MORRIS	April 29, 2011	22
15	96	[14] SELEZNEV	May 12, 2011	100
16	97	[17] MORRIS	June 14, 2011	20

Racketeering Acts 98 to 103Trafficking In and Possessing Access Device-Making Equipment

17. On or about each of the dates set forth below, in the State and Federal District of  
 Nevada, and elsewhere,

[9] SMITH;  
 [13] GEORGIEVSKI;  
 [15] MUKHTAR; and  
 [39] CONSIGLIORI;

defendants herein, together with other members and associates of the Carder.su organization,  
 including others known and unknown, did knowingly and with the intent to defraud, traffic in, have

1 control and custody over, and possess device-making equipment, that is blank plastic cards used in  
 2 the production of counterfeit access devices, which are issued, owned, managed and controlled by  
 3 a financial institution, account issuer, or credit card system member within the jurisdiction of the  
 4 United States, in and affecting interstate and foreign commerce, with each instance set forth below  
 5 constituting a separate violation of Title 18, United States Code, Sections 1029(a)(4), and (h):

<u>RA</u>	<u>Defendant</u>	<u>Date</u>	<u>Approx. No. Plastic Cards</u>
98	[13] GEORGIEVSKI	January 5, 2011	7
99	[15] MUKHTAR	March 22, 2011	26
100	[9] SMITH	April 5, 2011	10
101	[39] CONSIGLIORI	April 15, 2011	20
102	[39] CONSIGLIORI	May 23, 2011	20
103	[39] CONSIGLIORI	June 9, 2011	20

Racketeering Acts 104 to 109

**Conspiracy to Trafficking In and Possess Access Device-Making Equipment**

18. On or about each of the dates set forth below, in the States of Nevada, Connecticut,  
 Florida, New York, California, Arizona, New Jersey, North Carolina, Michigan, and elsewhere,

[5] WONG;  
 [9] SMITH;  
 [10] HAGGERTY;  
 [11] AJAYI;  
 [13] GEORGIEVSKI;  
 [15] MUKHTAR;  
 [23] CAMEZ;  
 [26] BUTLER; and  
 [29] MORFIY;

defendants herein, together with other members and associates of the Carder.su organization,  
 including others known and unknown, did knowingly and intentionally combine, conspire and agree  
 among themselves, and with others, to commit offenses against the laws of the United States, namely  
 to knowingly and with the intent to defraud, traffic in, have control and custody over, and possess

1 device-making equipment, that is blank plastic cards used in the production of counterfeit access  
 2 devices, which are issued, owned, managed and controlled by a financial institution, account issuer,  
 3 or credit card system member within the jurisdiction of the United States, in and affecting interstate  
 4 and foreign commerce, with each instance set forth below constituting a separate violation of Title  
 5 18, United States Code, Sections 1029(a)(4), and (h):

<u>RA</u>	<u>Defendant</u>	<u>Date</u>	<u>Approx. No. Plastic Cards</u>
104	[5] WONG	March 5, 2009 to March 9, 2009	50
105	[13] GEORGIEVSKI	March 19, 2009	27
106	[15] MUKHTAR & [23] CAMEZ	February 4, 2010	26
107	[29] MORFIY & [10] HAGGERTY	May 18, 2010	10
108	[9] SMITH & [26] BUTLER	August 31, 2010	10
109	[11] AJAYI & [26] BUTLER	February 16, 2011	10

16 **ALL IN VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION 1962(c).**

17 **COUNT TWO**

18 **Conspiracy to Engage in a Racketeer Influenced Corrupt Organization**

19 1. Paragraphs 1 through 5 of the General Allegations Section are hereby realleged and  
 20 incorporated as if fully set forth herein.

21 2. From on or about November 22, 2005, up through and including June 2011, the  
 22 defendants,

- 23 [1] ROMAN ZOLOTAREV a.k.a. Admin a.k.a. Support;
- 24 [2] KONSTANTIN LOPATIN a.k.a. Graf;
- 25 [3] ALEXANDER KOSTYUKOV a.k.a. Temp a.k.a. Klbs;
- 26 [4] MACEO BOOZER III a.k.a. XXXSimone a.k.a. G4 a.k.a. El Padrino  
       a.k.a. Mr. Right a.k.a. mrdc87;
- [5] TIN-YUEN WONG a.k.a. Ray Wong a.k.a. Ray;
- [6] EDWARD MONTECALVO a.k.a N1ghtmare a.k.a. Tenure44;

- [7] YU FENG WANG a.k.a Ibatistuta;
- [8] MOHAMED AMR MAHMOUD a.k.a. AMR MAHMOUD a.k.a.  
CC-- Trader a.k.a. Kengza;
- [9] JERMAINE SMITH a.k.a. Sircharlie57 a.k.a. Fairbusinessman;
- [10] MAKYL HAGGERTY a.k.a. Wave;
- [11] ALADELOLA TESLIM AJAYI a.k.a. Bank Manager a.k.a.  
Document Manager a.k.a. Corey;
- [12] ALEXANDRU ION a.k.a. Abagnalefrank;
- [13] JORDAN GEORGIEVSKI a.k.a. Devica;
- [14] ROMAN SELEZNEV a.k.a. Track2 a.k.a. Bulba a.k.a. Ncux;
- [15] QASIR MUKHTAR a.k.a. Caliber;
- [16] ROY AYAD a.k.a. RABIE AYAD a.k.a. Patistota;
- [17] MINA MORRIS a.k.a. Source;
- [18] RACHID IDAALI a.k.a. C4rd3R;
- [19] LIRIDON MUSLIU a.k.a. Bowl;
- [20] SERGEI LITVINENKO a.k.a. Dorbik a.k.a. Matad0r;
- [21] MICHAEL LOFTON a.k.a. Killit a.k.a. Lofeazy;
- [22] SHIYANG GOU a.k.a. Cder;
- [23] DAVID RAY CAMEZ a.k.a. Bad Man a.k.a. Doctorsex;
- [24] CAMERON HARRISON a.k.a. Kilobit;
- [25] ALEKSANDAR BESAROVIC a.k.a. Qiller;
- [26] DUVAUGHN BUTLER a.k.a. Mackmann;
- [27] FREDRICK THOMAS a.k.a 1Stunna;
- [28] JOHN DOE 1 a.k.a Senna071;
- [29] JOHN DOE 2 a.k.a. Morfiy;
- [30] JOHN DOE 3 a.k.a. Gruber;
- [31] JOHN DOE 4 a.k.a. Maxxtro;
- [32] JOHN DOE 5 a.k.a. Elit3;
- [33] JOHN DOE 6 a.k.a. Fozzy;
- [34] JOHN DOE 7 a.k.a. .Vitrum a.k.a. Lermentov;
- [35] ANDREI BOLOVAN a.k.a. Panther a.k.a. Euphoric a.k.a. Darkmth;
- [36] JOHN DOE 8 a.k.a. TM;
- [37] JOHN DOE 9 a.k.a. Zo0mer a.k.a. Deputat;
- [38] JOHN DOE 10 a.k.a. Centurion; and
- [39] JOHN DOE 11 a.k.a. Consigliori;

together with other persons known and unknown and others known and unknown, being persons who are members of, employed by, and associated with "the Carder.su organization," an enterprise, which engaged in, and the activities of which affected interstate and foreign commerce, knowingly, and intentionally conspired to violate Title 18, United States Code Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity involving multiple acts indictable under:

A. Title 18, United States Code, Section 1028, identity theft and fraud related to identification documents; and

1           B.       Title 18, United States Code, Section 1029, access device fraud.

2           3.       It was a part of the conspiracy that each defendant agreed that a conspirator would  
3 commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

4           **ALL IN VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION 1962(D).**

5           **COUNTS THREE THROUGH SEVENTEEN**  
6           **Trafficking in and Production of False Identification Documents**

7           On or about each of the dates set forth below, in the State and Federal District of Nevada, and  
8 elsewhere,

- 9           [3] **ALEXANDER KOSTYUKOV** a.k.a. Temp a.k.a. Klbs;  
10          [4] **MACEO BOOZER III** a.k.a. XXXSimone a.k.a. G4 a.k.a. El Padrino  
11          a.k.a. Mr. Right a.k.a. mrdc87;  
12          [5] **TIN-YUEN WONG** a.k.a. Ray Wong a.k.a. Ray;  
13          [6] **EDWARD MONTECALVO** a.k.a. N1ghtmare a.k.a. Tenure44;  
14          [21] **MICHAEL LOFTON** a.k.a. Killit a.k.a. Lofeazy;  
15          [22] **SHIYANG GOU** a.k.a. Cder;  
16          [23] **DAVID RAY CAMEZ** a.k.a. Bad Man a.k.a. Doctorsex;  
17          [24] **CAMERON HARRISON** a.k.a. Kilobit;  
18          [25] **ALEKSANDAR BESAROVIC** a.k.a. Qiller;  
19          [28] **JOHN DOE 1** a.k.a Senna071; and  
20          [29] **JOHN DOE 2** a.k.a. Morfiy;

21           defendants herein, together with and aiding and abetting one another, and others known and  
22          unknown, did knowingly and without lawful authority produce, and did cause others to produce,  
23          false identification documents, which were transported in the mail in the course of the unauthorized  
24          production, in and affecting interstate and foreign commerce, and the offense involved the  
25          production and transfer of false identification documents that are and appear to be driver's licenses,  
26          with each false identification document set forth below constituting a separate violation of Title 18,  
United States Code, Sections 1028(a)(1), (b)(1)(A)(ii), and (c)(3); and Title 18, United States Code,  
Section 2, as follows:

<u>Counts</u>	<u>Defendant</u>	<u>Date</u>	<u>Type of Document</u>	<u>Name</u>
THREE	[21] LOFTON	January 23, 2009	NV DL	M. Webb
FOUR	[3] KOSTYUKOV	April 24, 2009	NV DL	A. Kostyukov

1	FIVE	[4] <b>BOOZER III</b>	May 19, 2009	TX DL	M. Wright
2	SIX	[22] <b>GOU</b>	May 26, 2009	NV DL	J. Wang
3	SEVEN	[23] <b>CAMEZ</b>	May 28, 2009	NV DL	J. Henry
4	EIGHT	[3] <b>KOSTYUKOV</b>	June 30, 2009	NV DL	M. Ulitin
5	NINE	[5] <b>WONG</b>	September 14, 2009	NY DL	D. Pena
6	TEN	[28] <b>SENNA071</b>	October 6, 2009	NV DL	L. Sadik
7	ELEVEN	[3] <b>KOSTYUKOV</b>	October 13, 2009	WA DL	R. Sadriev
8	TWELVE	[28] <b>SENNA071</b>	October 20, 2009	NV DL	A. Davis
9	THIRTEEN	[6] <b>MONTECALVO</b>	November 9, 2009	VA DL	E. Montecalvo
10	FOURTEEN	[24] <b>MORFIY</b>	November 19, 2009	NV DL	F. Grolsh
11	FIFTEEN	[21] <b>LOFTON</b>	February 11, 2010	NV DL	K. Marshall
12	SIXTEEN	[24] <b>HARRISON</b>	February 25, 2010	GA DL	D. Mock
13	SEVENTEEN	[25] <b>BESAROVIC</b>	April 12, 2011	GA DL	D. Vasic

**COUNT EIGHTEEN****Attempt to Unlawfully Produce False Identification Documents; Aiding and Abetting**

From on or about April 16, 2011, until on or after May 18, 2011, in the State and Federal District of Nevada, and elsewhere, [30] **JOHN DOE 3** a.k.a. Gruber, defendant herein, together with and aiding and abetting others known and unknown, did knowingly and without lawful authority attempt to produce, and did attempt to cause others to produce, false identification documents, in and affecting interstate and foreign commerce, and the offense involved the production and transfer of false identification documents that are and appear to be approximately two (2) Florida driver's licenses, in violation of Title 18, United States Code, Sections 1028(a)(1), (b)(1)(A)(I), and (c)(3)(A); and (f); and Title 18, United States Code, Section 2.

**COUNT NINETEEN****Conspiracy to Unlawfully Transfer False Identification Documents**

Beginning on or about August 22, 2008, and continuing to on or about March 23, 2009, in the State of Nevada, and elsewhere, [1] **ROMAN ZOLOTAREV** a.k.a. Admin a.k.a. Support,

defendant herein, did knowingly and intentionally combine, conspire and agree with others known and unknown, to commit offenses against the laws of the United States, namely to knowingly transfer and cause others to transfer false identification documents, knowing that such documents were produced without lawful authority, and the production and transfer of the false identification documents was in and affecting interstate and foreign commerce, and the offense involved the production and transfer of false identification documents that are and appear to be driver's licenses, all in violation of Title 18, United States Code, Sections 1028(a)(2), (b)(1)(A)(ii), (c)(3)(A), and (f).

## COUNT TWENTY

## **Unlawful Transfer, Possession and Use of A Means of Identification; Aiding and Abetting**

On or about October 19, 2007, in the State and Federal District of Nevada, and elsewhere, [8] **MOHAMED AMR MAHMOUD** a.k.a. AMR MAHMOUD a.k.a. CC -- Trader a.k.a. Kengza, defendant herein, together with and aiding and abetting others known and unknown, did knowingly transfer, possess and use, in and effecting interstate and foreign commerce, without lawful authority, a means of identification of another person, including but not limited to, a stolen credit card account number, account holder's name, date of birth, Social Security number, address, and telephone number, that is, Discover Card account number X-5598; account holder's name B. Detrich; Social Security number X-9986; and telephone number X-5662; with the intent to commit and to aid and abet the commission of and in connection with any unlawful activity that constitutes a violation of Federal law, to wit: Wire Fraud in violation of Title 18, United States Code, Section 1343, all in violation of Title 18, United States Code Sections 1028(a)(7), (b)(2)(B), and (c)(3)(A); and Title 18, United States Code, Section 2.

## COUNT TWENTY ONE

## **Trafficking in and Use of Counterfeit and Unauthorized Access Devices; Aiding and Abetting**

On or about March 1, 2011, in the State and Federal District of Nevada, and elsewhere, [26] **DUVAUGHN BUTLER** a.k.a. Mackmann, defendant herein, together with and aiding and abetting others known and unknown, did knowingly and with intent to defraud, traffic in and use an

1 unauthorized access device, to wit: a Chase Bank MasterCard credit card account, number ending  
 2 in X-8088, which was stolen and obtained with the intent to defraud, and by such conduct did, on  
 3 or about that same date, obtain things of value in excess of one thousand dollars (\$1,000.00), that  
 4 is, approximately one thousand fifty three dollars (\$1,053.00) in goods and merchandise, from  
 5 Walmart, store number 2593, in or around Las Vegas, Nevada, with said trafficking and use in and  
 6 affecting interstate commerce, all in violation of Title 18, United States Code, Sections 1029(a)(2)  
 7 and (c)(1)(a)(I); and Title 18, United States Code, Section 2.

**COUNTS TWENTY TWO THROUGH FIFTY FIVE**  
**Possession of Fifteen or More Counterfeit and Unauthorized Access Devices;**  
**Aiding and Abetting**

8 On or about each of the dates set forth below, in the State and Federal District of Nevada, and  
 9 elsewhere,

- 10 [2] KONSTANTIN LOPATIN a.k.a. Graf;
- 11 [6] EDWARD MONTECALVO a.k.a. N1ghtmare a.k.a. Tenure44;
- 12 [8] MOHAMED AMR MAHMOUD a.k.a. AMR MAHMOUD a.k.a.  
     CC- - Trader a.k.a. Kengza;
- 13 [14] ROMAN SELEZNEV a.k.a. Track2 a.k.a. Bulba a.k.a. Ncux;
- 14 [16] ROY AYAD a.k.a. RABIE AYAD a.k.a. Patistota;
- 15 [17] MINA MORRIS a.k.a. Source;
- 16 [18] RACHID IDAALI a.k.a. C4rd3R;
- 17 [19] LIRIDON MUSLIU a.k.a. Bowl;
- 18 [33] JOHN DOE 6 a.k.a. Fozzy;
- 19 [34] JOHN DOE 7 a.k.a. .Vitrum a.k.a. Lermentov;
- [35] ANDREI BOLOVAN a.k.a. Panther a.k.a. Euphoric a.k.a. Darkmth;
- [36] JOHN DOE 8 a.k.a. TM;
- [37] JOHN DOE 9 a.k.a. Zo0mer a.k.a. Deputat;and
- [38] JOHN DOE 10 a.k.a. Centurion;

20 defendants herein, together with and aiding and abetting one another and others, known and  
 21 unknown, knowingly and with intent to defraud, did possess fifteen (15) or more unauthorized access  
 22 devices, that is stolen credit and debit card account numbers issued to persons other than the  
 23 defendants, in and affecting interstate and foreign commerce, with each instance set forth below  
 24 constituting a separate violation of Title 18, United States Code, Sections 1029(a)(3), and  
 25 (c)(1)(A)(I); and Title 18 United States Code, Section 2, as follows:

26 . . .

<u>Count</u>	<u>Defendant</u>	<u>Date</u>	<u>Approximate No. Devices</u>
TWENTY TWO	[8] MAHMOUD	February 22, 2008	22
TWENTY THREE	[8] MAHMOUD	March 9, 2009	25
TWENTY FOUR	[6] MONTECALVO	January 21, 2010	50
TWENTY FIVE	[6] MONTECALVO	April 5, 2010	220
TWENTY SIX	[14] SELEZNEV	January 20, 2011	29
TWENTY SEVEN	[11] AYAD	March 15, 2011	15
TWENTY EIGHT	[36] TM	March 16, 2011	20
TWENTY NINE	[14] SELEZNEV	March 18, 2011	20
THIRTY	[37] ZO0MER	March 18, 2011	20
THIRTY ONE	[17] MORRIS	March 18, 2011	17
THIRTY TWO	[18] IDAALI	March 23, 2011	20
THIRTY THREE	[2] LOPATIN	March 24, 2011	20
THIRTY FOUR	[11] AYAD	March 24, 2011	20
THIRTY FIVE	[33] FOZZY	March 24, 2011	20
THIRTY SIX	[36] TM	March 24, 2011	20
THIRTY SEVEN	[37] ZO0MER	March 24, 2011	23
THIRTY EIGHT	[38] CENTURION	March 24, 2011	18
THIRTY NINE	[18] IDAALI	March 26, 2011	60
FORTY	[34] VITRUM	March 28, 2011	20
FORTY ONE	[38] CENTURION	March 28, 2011	74
FORTY TWO	[33] FOZZY	March 28, 2011	22
FORTY THREE	[35] BOLOVAN	March 28, 2011	20
FORTY FOUR	[2] LOPATIN	March 29, 2011	21
FORTY FIVE	[35] BOLOVAN	April 6, 2011	38
FORTY SIX	[35] BOLOVAN	April 8, 2011	20

<u>Count</u>	<u>Defendant</u>	<u>Date</u>	<u>Approximate No. Devices</u>
FORTY SEVEN	[2] <b>LOPATIN</b>	April 10, 2011	21
FORTY EIGHT	[18] <b>IDAALI</b>	April 11, 2011	20
FORTY NINE	[36] <b>TM</b>	April 11, 2011	20
FIFTY	[37] <b>ZOOMER</b>	April 11, 2011	19
FIFTY ONE	[19] <b>MUSLIU</b>	April 12, 2011	49
FIFTY TWO	[38] <b>CENTURION</b>	April 12, 2011	22
FIFTY THREE	[19] <b>MUSLIU</b>	April 22, 2011	12,710
FIFTY FOUR	[17] <b>MORRIS</b>	April 29, 2011	15
FIFTY FIVE	[14] <b>SELEZNEV</b>	May 12, 2011	100

**COUNTS FIFTY SIX THROUGH SIXTY****Trafficking In and Possessing Access Device-Making Equipment; Aiding and Abetting**

On or about each of the dates set forth below, in the State and Federal District of Nevada, and elsewhere,

[9] **JERMAINE SMITH** a.k.a. Sircharlie57 a.k.a. Fairbusinessman;  
 [15] **QASIR MUKHTAR** a.k.a. Caliber; and  
 [39] **JOHN DOE 11** a.k.a. Consiglieri;

defendants herein, together with and aiding and abetting one another, and others known and unknown, did knowingly and with the intent to defraud, traffic in, have control and custody over, and possess device-making equipment, that is blank plastic cards used in the production of counterfeit access devices, which are issued, owned, managed and controlled by a financial institution, account issuer, or credit card system member within the jurisdiction of the United States, in and affecting interstate and foreign commerce, with each instance set forth below constituting a separate violation of Title 18, United States Code, Sections 1029(a)(4), (c)(1)(A)(ii), and (h); and Title 18, United States Code, Section 2, as more fully set forth below:

. . .

. . .

<u>COUNT</u>	<u>Defendant</u>	<u>Date</u>	<u>Approximate No. Plastic Cards</u>
FIFTY SIX	[15] MUKHTAR	March 22, 2011	26
FIFTY SEVEN	[9] SMITH	April 5, 2011	10
FIFTY EIGHT	[39] CONSIGLIORI	April 15, 2011	20
FIFTY NINE	[39] CONSIGLIORI	May 23, 2011	20
SIXTY	[39] CONSIGLIORI	June 9, 2011	20

**COUNTS SIXTY ONE AND SIXTY TWO****Conspiracy to Trafficking In and Possess Access Device-Making Equipment**

On or about the dates set forth below, in the State and Federal District of Nevada, and elsewhere,

[9] JERMAINE SMITH a.k.a. Sircharlie57 a.k.a. Fairbusinessman;  
 [11] ALADELOLA TESLIM AJAYI a.k.a. Bank Manager a.k.a.  
 Document Manager a.k.a. Corey; and  
 [26] DUVAUGHN BUTLER a.k.a. Mackmann;

defendants herein, together with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree among themselves, and with others, to commit offenses against the laws of the United States, namely, to knowingly and with the intent to defraud, traffic in, have control and custody over, and possess device-making equipment, that is, blank plastic cards used in the production of counterfeit access devices, which are issued, owned, managed and controlled by a financial institution, account issuer, or credit card system member within the jurisdiction of the United States, in and affecting interstate and foreign commerce, with each instance set forth below constituting a separate violation of Title 18, United States Code, Sections 1029(a)(4), (b)(2), (c)(1)(A)(ii), and (h), as more fully set forth below:

<u>COUNT</u>	<u>Defendant</u>	<u>Date</u>	<u>Approx. No. Plastic Cards</u>
SIXTY ONE	[9] SMITH & [26] BUTLER	August 31, 2010	10
SIXTY TWO	[11] AJAYI & [26] BUTLER	February 16, 2011	10

## FORFEITURE ALLEGATION

1        1. The allegations contained in Counts One and Two of this Indictment are hereby  
 2 repeated, realleged, and incorporated by reference herein as though fully set forth at length for the  
 3 purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section  
 4 1963 and Title 28, United States Code, Section 2461(c). Pursuant to Rule 32.2, Fed. R. Crim. P.,  
 5 notice is hereby given to the defendants that the United States will seek forfeiture as part of any  
 6 sentence in accordance with Title 18, United States Code, Section 1963 in the event of any  
 7 defendant's conviction under Counts One and Two.

8        2. The defendants,

- [1] **ROMAN ZOLOTAREV** a.k.a. Admin a.k.a. Support;
- [2] **KONSTANTIN LOPATIN** a.k.a. Graf;
- [3] **ALEXANDER KOSTYUKOV** a.k.a. Temp a.k.a. Klbs;
- [4] **MACEO BOOZER III** a.k.a. XXXSimone a.k.a. G4 a.k.a. El Padrino a.k.a. Mr. Right a.k.a. mrdc87;
- [5] **TIN-YUEN WONG** a.k.a. Ray Wong a.k.a. Ray;
- [6] **EDWARD MONTECALVO** a.k.a. N1ghtmare a.k.a. Tenure44;
- [7] **YU FENG WANG** a.k.a. Ibatistuta;
- [8] **MOHAMED AMR MAHMOUD** a.k.a. AMR MAHMOUD a.k.a. CC -- Trader a.k.a. Kengza;
- [9] **JERMAINE SMITH** a.k.a. Sircharlie57 a.k.a. Fairbusinessman;
- [10] **MAKYL HAGGERTY** a.k.a. Wave;
- [11] **ALADELOLA TESLIM AJAYI** a.k.a. Bank Manager a.k.a. Document Manager a.k.a. Corey;
- [12] **ALEXANDRU ION** a.k.a. Abagnalefrank;
- [13] **JORDAN GEORGIEVSKI** a.k.a. Devica;
- [14] **ROMAN SELEZNEV** a.k.a. Track2 a.k.a. Bulba a.k.a. Ncux;
- [15] **QASIR MUKHTAR** a.k.a. Caliber;
- [16] **ROY AYAD** a.k.a. RABIE AYAD a.k.a. Patistota;
- [17] **MINA MORRIS** a.k.a. Source;
- [18] **RACHID IDAALI** a.k.a. C4rd3R;
- [19] **LIRIDON MUSLIU** a.k.a. Bowl;
- [20] **SERGEI LITVINENKO** a.k.a. Dorbik a.k.a. Matad0r;
- [21] **MICHAEL LOFTON** a.k.a. Killit a.k.a. Lofeazy;
- [22] **SHIYANG GOU** a.k.a. Cder;
- [23] **DAVID RAY CAMEZ** a.k.a. Bad Man a.k.a. Doctorsex;
- [24] **CAMERON HARRISON** a.k.a. Kilobit;
- [25] **ALEKSANDAR BESAROVIC** a.k.a. Qiller;
- [26] **DUVUAUGHN BUTLER** a.k.a. Mackmann;
- [27] **FREDRICK THOMAS** a.k.a. 1Stunna;
- [28] **JOHN DOE 1** a.k.a. Senna071;
- [29] **JOHN DOE 2** a.k.a. Morfiy;
- [30] **JOHN DOE 3** a.k.a. Gruber;
- [31] **JOHN DOE 4** a.k.a. Maxxtro;

- 1 [32] JOHN DOE 5 a.k.a. Elit3;  
 2 [33] JOHN DOE 6 a.k.a. Fozzy;  
 3 [34] JOHN DOE 7 a.k.a. Vitrum a.k.a. Lermentov;  
 4 [35] ANDREI BOLOVAN a.k.a. Panther a.k.a. Euphoric a.k.a. Darkmth;  
 5 [36] JOHN DOE 8 a.k.a. TM;  
 6 [37] JOHN DOE 9 a.k.a. Zo0mer a.k.a. Deputat;  
 7 [38] JOHN DOE 10 a.k.a. Centurion; and  
 8 [39] JOHN DOE 11 a.k.a. Consigliori;

9 i. have acquired and maintained interests in violation of Title 18, United States  
 10 Code, Section 1962, which interests are subject to forfeiture to the United States pursuant to Title  
 11 18, United States Code, Section 1963(a)(1);

12 ii. have an interest in, security of, claims against, and property and contractual  
 13 rights which afford a source of influence over, the enterprise named and described herein which the  
 14 defendants established, operated, controlled, conducted, and participated in the conduct of, in  
 15 violation of Title 18, United States Code, Section 1962, which interests, securities, claims, and rights  
 16 are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963  
 17 (a)(2);

18 iii. have property constituting and derived from proceeds obtained, directly and  
 19 indirectly, from racketeering activity, in violation of Title 18, United States Code, Section 1962,  
 20 which property is subject to forfeiture to the United States pursuant to Title 18, United States Code,  
 Section 1963(a)(3).

21 3. The interests of the defendants subject to forfeiture to the United States pursuant to  
 22 Title 18, United States Code, Section 1963(a)(1), (a)(2), and (a)(3), include but are not limited to at  
 23 least twenty (20) million dollars and all interests and proceeds traceable thereto.

24 4. If any of the property cannot be located, has been transferred or sold to or deposited  
 25 with a third party, has been placed beyond the jurisdiction of the court, has been substantially  
 26 diminished in value, or has been commingled with other property which cannot be divided without  
 difficulty, the court shall order the forfeiture of any other property of the defendants up to the value  
of at least twenty (20) million dollars and all interests and proceeds traceable thereto as set forth in  
Section 1963(m).

5. The above-named defendants, and each of them, are jointly and severally liable for the forfeiture obligations as alleged above.

All pursuant to Title 18, United States Code, Section 1963.

**DATED:** this 10 day of January, 2012.

**A TRUE BILL:**

/s/  
**FOREPERSON OF THE GRAND JURY**

DANIEL G. BOGDEN  
United States Attorney

KIMBERLY M. FRAYN  
ANDREW W. DUNCAN  
Assistant United States Attorneys